



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

July 22, 2024

BY ECF

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Sue Mi Terry, 24 Cr. 427 (LGS)

Dear Judge Schofield:


Pursuant to the Court's order dated July 18, 2024, (Dkt. 10), the parties jointly write to propose the following schedule for discovery, the filing of motions, and for a status conference:

- The Government will substantially complete its production of unclassified discovery by August 26, 2024.
- The parties propose a status conference the week of September 23 or September 30.
- The parties propose the Court defer setting a motions schedule given the substantial volume of discovery and the likelihood of classified litigation in this case.

Finally, the Government moves, with the consent of the defendant, to exclude Speedy Trial time until the date of the status conference in order for the parties to produce and review discovery, to consider potential motions, and to discuss any pretrial resolution of the case. *See* 18 U.S.C. § 3161(h)(7).

Respectfully submitted,

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